

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

BETHEL MINISTRIES, INC.,)	
)	
)	
<i>Plaintiff,</i>)	
)	Case No. 1:19-cv-01853-SAG
DR. KAREN B. SALMON, et al.,)	
)	
)	
<i>Defendants.</i>)	
_____)	

JOINT CONSENT MOTION TO DEFER DEADLINES
FOR FILING OF FEE PETITION

The parties move pursuant to Fed. R. Civ. P. 6 for an extension of time to file Plaintiff's Petition for Attorneys' Fees, Costs, and Expenses and Defendants' response to Plaintiff's Petition. On December 10, 2021, this Court issued its Opinion and Order on the parties' cross-motions for summary judgment, ruling in Plaintiff's favor. In the wake of that decision, the parties began negotiations to resolve the issue of attorneys' fees and sought an extension of the deadline to facilitate those negotiations. Plaintiff's Petition is currently due January 31, 2022.

On January 12, 2022, this Court issued an Amended Opinion and an Amended Order. The deadline for the parties to file a Notice of Appeal is February 11, 2022. Considering the possibility of appeal by one or more of the parties and to facilitate continued negotiation on the issue of fees, the parties now respectfully request that the court defer the fee petition deadlines until an appeal is resolved. Specifically, should neither party file a notice of appeal, Plaintiff's Petition would be due two weeks after that date on February 25, 2022. Similarly, Defendant's

response would be due March 28, 2022, respectively. In the event that any party appeals, however, this Court would set new deadlines after the appeal concludes.

The parties request this deferral out of respect for judicial time and resources, and in light of the prospect of a non-judicial resolution of the fee issue. It will allow the parties to continue their good faith negotiations in hopes of resolving the issue of attorneys' fees without incurring additional costs. And waiting for the resolution of any appeal will further prevent any unnecessary expenditure of judicial resources.

CONCLUSION

WHEREFORE, for the reasons stated herein, the parties ask the Court to grant their motion to defer the deadlines for Plaintiff to file a Petition for Attorneys' Fees, Costs, and Expenses pending potential appeal, and the deadline for Defendants to file a response accordingly.

Respectfully submitted this 26th day of January, 2022.

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* Appearing *Pro Hac Vice*

CERTIFICATE OF SERVICE

I certify that on this 26th day of January, 2022, the foregoing was served by CM/ECF on all registered CMF users.

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